

1 DENNIS J. HERRERA, State Bar #139669  
 2 City Attorney  
 2 JOANNE HOEPER, State Bar #114961  
 3 Chief Trial Deputy  
 3 RONALD P. FLYNN, State Bar #184186  
 4 WARREN METLITZKY, State Bar # 220758  
 4 Deputy City Attorneys  
 5 Fox Plaza  
 5 1390 Market Street, 6<sup>th</sup> Floor  
 6 San Francisco, California 94102-5408  
 6 Telephone: (415) 554-3901  
 7 Facsimile: (415) 554-3837

7  
 8 Attorneys for Defendants  
 8 CITY AND COUNTY OF SAN FRANCISCO,  
 9 KEVIN WORRELL, and DAMIEN FAHEY

9  
 10 UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 ADRIENNE MACBETH,

13 Plaintiff,

14 vs.

15 CITY AND COUNTY OF SAN  
 16 FRANCISCO, a municipal corporation;  
 17 KEVIN WORRELL, individually and in  
 18 his official capacity as a police officer for  
 19 the CITY AND COUNTY OF SAN  
 20 FRANCISCO, DAMIEN FAHEY,  
 21 individually and in his official capacity as  
 22 a police officer for the CITY AND  
 23 COUNTY OF SAN FRANCISCO; and  
 24 DOES 1-50, individually and in their  
 25 official capacities.

26 Defendants.

27 Case No. C07-3304 MEJ

28 STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND NON-EXPERT  
 DISCOVERY FROM JUNE 6, 2008 TO  
 JUNE 25, 2008

Date Action Filed: June 22, 2007  
 Trial Date: December 8, 2008

1 Plaintiff Adrienne MacBeth and Defendants City And County Of San Francisco, Kevin  
 2 Worrell, and Damien Fahey (the "Parties") by and through their counsel hereby stipulate as follows:

3 The parties are in the process of completing discovery. Some items left to be completed,  
 4 including an agreed-upon Independent Medical Examination of plaintiff, scheduled to take place on  
 5 June 23, 2008. To allow that examination to go forward, and to all completion of any other  
 6 discovery, the have agreed to seek a brief extension of non-expert discovery in this matter.

7 Currently, the schedule for non-expert discovery is as follows:

8 Close of Discovery June 6, 2008

9 Motions to Compel deadline 10 days later.

10 (Case Management Order [Docket #23] at 7-8.)

11 The parties stipulate to the following schedule regarding non-expert discovery:

12 Close of Discovery June 25, 2008

13 Motions to Compel deadline 10 days later.

14 For good cause, the Parties request that the Court order that the above schedule be experts be  
 15 entered.

16 Dated: May 22, 2008

17 DENNIS J. HERRERA  
 18 City Attorney  
 19 JOANNE HOEPER  
 20 Chief Trial Deputy  
 21 RONALD P. FLYNN  
 22 WARREN METLITZKY  
 23 Deputy City Attorneys

24 -/s/- Ronald P. Flynn

25 By: \_\_\_\_\_  
 26 RONALD P. FLYNN

27 Attorneys for Defendants  
 28 CITY AND COUNTY OF SAN FRANCISCO,  
 KEVIN WORRELL, and DAMIEN FAHEY

1 Dated: May 22, 2008  
2  
3  
4

SANFORD M. CIPINKO  
JEREMY CLOYD  
LAW OFFICE OF SANFORD M. CIPINKO

5 \*

6 By: \_\_\_\_\_  
7 JEREMY CLOYD

8 Attorneys for Plaintiff  
9 ADRIENNE MACBETH

10 \* The ECF filer attests that concurrence in the filing of the document has been obtained from this  
11 signatory. Civ. L. R. Gen. Order 45, § X (B).

12 [PROPOSED] ORDER

13 For Good Cause, the Court modifies the non-expert discovery dates as listed above.

14 IT IS SO ORDERED

15 Dated: May 23, 2008

16 By: \_\_\_\_\_  
17 MARLA ELLA JAMES  
18 United States Magistrate Judge  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28